

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

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RM-1141

In Re:

Justice Watts

Case No. 19-28370JNP

Judge:

Chapter 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO**

**X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

**TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following  
(choose one):

1. \_\_\_\_\_ Motion for Relief from the Automatic Stay filed by \_\_\_\_\_, creditor. A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_ a.m.

OR

\_\_\_\_\_ Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for \_\_\_\_\_ at \_\_\_\_\_ a.m.

OR

  X   Certification of Default filed by Rushmore Loan Management Services LLC, creditor. I am requesting that a hearing be scheduled on this matter.

OR

\_\_\_\_\_ Certification of Default filed by Standing Chapter 13 Trustee. I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

\_\_\_\_\_ Payments have been made in the amount of \$\_\_\_\_\_, but have not been accounted for. Documentation in support is attached hereto.

OR

\_\_\_\_\_ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

**X** Other: I will cure the arrears by making a \$9,000.00 payment prior to 1/5/2023, with the balance paid over a 12 month period, by making equal monthly payments. I will continue to make my regular monthly payments, as well. I respectfully request that the movant's motion be denied so that I may cure the arrears and continue with my bankruptcy plan.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 12/21/2022

/s/ Justice Watts  
Justice Watts, Debtor